

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

RONALD KOONS, <i>et al.</i>)	
)	Civil Action No. 1:22-cv-07464-
<i>Plaintiffs</i>)	RMB-AMD
)	
v.)	<u>CIVIL ACTION</u>
)	
WILLIAM REYNOLDS, <i>et al.</i>)	(ELECTRONICALLY FILED)
)	
<i>Defendants</i>)	
)	
-----)	CONSOLIDATED ACTIONS
)	
AARON SIEGEL, <i>et al.</i>)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	
MATTHEW PLATKIN, <i>et al.</i>)	
)	
<i>Defendants.</i>)	

**DECLARATION OF DANIEL L. SCHMUTTER IN SUPPORT OF
SIEGEL PLAINTIFFS' MOTION FOR LEAVE TO FILE A
SUPPLEMENTAL REPLY LETTER BRIEF IN RESPONSE TO
SUPPLEMENTAL DECLARATION OF DAVID REBUCK**

1. I, Daniel L. Schmutter, am an attorney of the State of New Jersey and a member of Hartman & Winnicki, P.C., attorneys of record for the *Siegel* Plaintiffs in the above-titled action. I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, could and would testify competently thereto. I

submit this certification in support of *Siegel* Plaintiffs' Motion for leave to file a supplemental reply letter brief in response to the Supplemental Declaration of David Rebuck.

2. By letter dated February 2, 2023, the parties notified the Court that they had agreed to a briefing schedule [ECF No. 61]. That schedule did not include supplemental filings after the reply papers of Plaintiffs.

3. Nevertheless on March 6, 2023, after briefing had concluded, the State Defendants filed the Supplemental Declaration of David Rebuck [ECF No. 105-1].

4. Accordingly, *Siegel* Plaintiffs seek leave to file a short letter brief in response.

I declare under penalty of perjury that the foregoing is true and correct.
Executed within the United States.

s/ Daniel L .Schmutter

Daniel L. Schmutter

March 10, 2023

Date